

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

HAAS OUTDOORS, INC.

Plaintiff,

v.

DRYSHOD INTERNATIONAL, LLC,  
AND JAMES K. DONOHUE

Defendants.

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C.A. NO. 1:18-cv-00978-RP  
[LEAD CASE]

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DRYSHOD INTERNATIONAL, LLC,  
AND JAMES K. DONOHUE

Plaintiffs,

v.

HAAS OUTDOORS, INC.,

Defendant.

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C.A. NO. 1:18-cv-00596-RP  
[CONSOLIDATED]

**PLAINTIFF'S NOTICE TO COURT OF  
FILING OF RESPONSIVE PRETRIAL DISCLOSURES**

**EXHIBIT I**

**Plaintiff's Objections and Counter-Designations to  
Defendants' Deposition Designations**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

HAAS OUTDOORS, INC.	§	
	§	
Plaintiff,	§	C.A. NO. 1:18-cv-00978-RP
	§	[LEAD CASE]
v.	§	
	§	
DRYSHOD INTERNATIONAL, LLC, AND JAMES K. DONOHUE	§	
	§	
	§	
Defendants.	§	

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DRYSHOD INTERNATIONAL, LLC, AND JAMES K. DONOHUE	§	
	§	
Plaintiffs,	§	C.A. NO. 1:18-cv-00596-RP
	§	[CONSOLIDATED]
v.	§	
	§	
HAAS OUTDOORS, INC.,	§	
	§	
Defendant.	§	

**PLAINTIFF’S OBJECTIONS AND COUNTER-DESIGNATIONS  
TO DEFENDANTS’ DEPOSITION DESIGNATIONS**

Pursuant to Local Rule CV-16(g)(1) and the parties’ Joint Notice Regarding Deposition Designations for Trial (Dkt. #261), Plaintiff Haas Outdoors, Inc. (“Haas Outdoors”), submits its Objections and Counter-Designations to Defendants Dryshod International, LLC’s and James K. Donohue’s (“Defendants”) September 30, 2021 Deposition Designations (Dkt. #263-2).

Unless otherwise noted, the numbers listed in the fourth column of the chart below (labeled “Objections”) correspond with the numbered rules in the Federal Rules of Evidence. For example, “408” is a reference to Fed. R. Evid. 408.

DESIGNATIONS FROM SEPTEMBER 11, 2019 DEPOSITION TESTIMONY OF TOXEY HAAS					
Defendants' Designations	Plaintiff's Objections	Plaintiff's Counter-Designations	Defendants' Objections to Plaintiff's Counter-Designations	Defendants' Counter-Counter Designations	Plaintiff's Objections to Counter-Counter Designations
12:15-24					
18:5-6					
18:19-19:5		19:6-9			
19:10-14		19:22-20:14			
26:13-18					
27:19-28:12 (Ex. 6)	402, 901	97:10-99:2			
31:10-16 (Ex. 7)	402, 901	31:17-32:14			
34:3-7 (Ex. 8)	402, 901				
34:15-35:2	402, 901				
43:20-44:19	402, 403				
46:3-19	402, 403				
54:2-13	402, 403				
58:3-8	402, 403				
69:10-70:1	402, 403				
72:9-10,19-22 (Ex.9)	402, 403, 901				

DESIGNATIONS FROM SEPTEMBER 11, 2019 DEPOSITION TESTIMONY OF TOXEY HAAS					
Defendants' Designations	Plaintiff's Objections	Plaintiff's Counter-Designations	Defendants' Objections to Plaintiff's Counter-Designations	Defendants' Counter-Counter Designations	Plaintiff's Objections to Counter-Counter Designations
73:1-14	402, 403				
79:13-80:6	402, 403				
81:4-12	402, 403				
82:9-15 (Ex. 10)	402, 901				
83:1-22	402				
86:19-22	402				
88:12-23	402				
103:18- 104:14	402				
108:5-24 (Ex. 13)	402, 403, 802				
109:23- 110:19	402, 403, 802				
111:5-24	402, 403				
113:6-8 (Ex. 5)	402				
114:3-6	402				
119:22-121:6	402				
122:21-123:1	402				

<b>DESIGNATIONS FROM SEPTEMBER 11, 2019 DEPOSITION TESTIMONY OF TOXEY HAAS</b>					
<b>Defendants' Designations</b>	<b>Plaintiff's Objections</b>	<b>Plaintiff's Counter-Designations</b>	<b>Defendants' Objections to Plaintiff's Counter-Designations</b>	<b>Defendants' Counter-Counter Designations</b>	<b>Plaintiff's Objections to Counter-Counter Designations</b>
125:7-126:6	402				
128:7-13	402				
129:18-21	402				
132:22-133:14	402				
134:19-135:12	402				
137:10-19	402, 408				
141:21-143:14					
146:8-10		145:11-146:7, 146:11-16			
150:3-151:14	402	151:15-152:1			
152:2-7	402				
160:2-20 (Ex. 14)					
161:14-23					
162:15-163:20 (Ex. 15)		163:21-164:17			
164:18-22		164:23-165:24			

DESIGNATIONS FROM SEPTEMBER 11, 2019 DEPOSITION TESTIMONY OF TOXEY HAAS					
Defendants' Designations	Plaintiff's Objections	Plaintiff's Counter-Designations	Defendants' Objections to Plaintiff's Counter-Designations	Defendants' Counter-Counter Designations	Plaintiff's Objections to Counter-Counter Designations
169:3-20 (Ex. 17)					
172:18- 173:24 (Ex. 19)					
180:21- 181:2, 19-25		181:3-18, 182:1-15			
185:20- 186:16		184:13-185:19, 186:17-23			
190:7-12					
191:14-192:7					
195:2-8					
197:14- 199:25		196:1-197:13, 200:1-2			
200:13-20					
202:18- 203:21	402, 602, 701				
205:15-19	402, 602, 701				
208:5-12	402, 602, 701				
211:1-21	402, 408				
212:3-12	402, 408				

Dated: October 7, 2021

Respectfully submitted,

HAAS OUTDOORS, INC.

By Its Attorneys,  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document is being filed electronically via the Court's CM/ECF system.

Dated: October 7, 2021

s/ Andrew S. Harris  
ANDREW S. HARRIS